

EXHIBIT 11

From: [Fetzer, Brandon](#)
To: [Freyberg, Michael](#); [O'Connor, Maeve](#); [Greenfield, Elliot](#); [Tancil, Jillian](#)
Cc: [Thorne, Leslie](#); [Bottini, Aishlinn](#); [Mitchell, Lori](#)
Subject: Re: GMO v. Whinstone
Date: Thursday, July 27, 2023 12:52:06 PM
Attachments: [image001.jpg](#)

EXTERNAL: Sent from outside Haynes and Boone, LLP
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Mike,

I'm writing in response to your call yesterday. Whinstone is extremely disappointed that, with only three days remaining until the July 29 deadline, GMO now seeks to further delay deinstallation of its machines in order to have an expert visit the Texas Facility. As you know, every day that deinstallation is delayed causes substantial financial harm to Whinstone. GMO's request is particularly unreasonable given that it stated nearly two months ago, in response to our May 24 letter, that it had preserved all relevant evidence regarding the location, functionality and condition of its machines and that it did not believe that sending an expert to the Texas Facility on its behalf was necessary. GMO still has not specified what additional evidence, if any, it believes should be preserved for trial.

Accordingly, we do not see any basis to delay deinstallation for an additional 2 or 3 weeks merely to accommodate the schedule of GMO's expert. Given the generous notice provided to GMO, there is no reason that an expert visit could not be scheduled far more promptly.

As a courtesy, Whinstone will not begin deinstallation until August 2, 2023. That should provide more than enough time for GMO's expert to visit the Texas Facility.

I'm available to discuss today after 4pm ET.

Brandon

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On Jul 26, 2023, at 7:28 PM, Fetzer, Brandon <bfetzer@debevoise.com> wrote:

Hi Mike,

See attached.

Brandon

Brandon Fetzer | Associate | Debevoise & Plimpton LLP | bfetzer@debevoise.com | +1 212 909 6880 | www.debevoise.com

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From: Freyberg, Michael [mailto:Michael.Freyberg@haynesboone.com]
Sent: Monday, July 24, 2023 23:36
To: O'Connor, Maeve; Greenfield, Elliot; Fetzer, Brandon; Sundararajan, Anagha; Maass, Molly Baltimore
Cc: Thorne, Leslie; Bottini, Aishlinn; Mitchell, Lori
Subject: GMO v. Whinstone

EXTERNAL

Counsel,

Please see the attached correspondence.

<image001.jpg>

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